

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

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<b>IN RE PHARMACEUTICAL INDUSTRY AVERAGE WHOLESALE PRICE LITIGATION</b>	) <b>MDL No. 1456</b>
	) <b>Master File No. 01-12257-PBS</b>
	) <b>Subcategory Case No. 06-11337</b>
	)
	) <b>Judge Patti B. Saris</b>
<b>THIS DOCUMENT RELATES TO:</b>	)
<i>State of California, ex rel. Ven-A-Care of the Florida Keys, Inc. v. Abbott Laboratories, Inc., et al.</i>	) <b>Magistrate Judge</b>
	) <b>Marianne B. Bowler</b>
Case No: 1:03-cv-11226-PBS	)
	)

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**DECLARATION OF RITA HANSCOM IN SUPPORT OF PLAINTIFFS'  
SUR-REPLY IN OPPOSITION TO DEY, INC. AND DEY, L.P.'S  
MOTION FOR PARTIAL SUMMARY JUDGMENT**

I, Rita Hanscom, do hereby declare as follows:

1. I am a Deputy Attorney General with the California Department of Justice, Bureau of Medi-Cal Fraud and Elder Abuse. I am admitted to practice law in the State of California and have been admitted *pro hac vice* in this matter.
2. On behalf of Plaintiff State of California, I am submitting with this declaration Exhibits in support of Plaintiffs' Sur-Reply in Opposition to Dey, Inc. and Dey, L.P.'s ("Dey") Motion for Partial Summary Judgment.
3. The following exhibits are true and correct copies of the materials described:

<b>Exhibit No.</b>	<b>Description</b>
25	Rule 30(b)(6) Deposition of California Department of Health Care Services (Maureen Tooker), taken October 21, 2008, selected pages
26	Deposition of Vic Walker, taken May 21, 2009, selected pages
27	Deposition of J. Kevin Gorospe, taken September 22, 2008, selected pages
28	Document produced by Dey, DL 63384-63386

<b>Exhibit No.</b>	<b>Description</b>
29	Document produced by Dey (005)
30	Deposition of Charles Rice, taken October 30, 2001, selected pages
31	Rule 30(b)(6) Deposition of California Department of Health Care Services (J. Kevin Gorospe), taken May 6, 2009, selected pages
32	Rule 30(b)(6) Deposition of Dey (Pamela Marrs), taken July 10, 2008, selected pages
33	Deposition of Russell Johnston, taken December 10, 2008, selected pages <i>(Designated Confidential - Filed Under Seal)</i>

I declare under penalty of perjury that the foregoing is true and correct.

Executed January 29, 2010, at San Diego, California.

/s/ Rita Hanscom  
RITA HANSCOM

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing was delivered to all counsel of record by electronic service pursuant to Paragraph 11 of the Case Management Order No. 2, by sending on January 29, 2010, a copy to Lexis-Nexis for posting and notification to all parties.

/s/ Rita Hanscom  
RITA HANSCOM